

1 DAVID R. ZARO (BAR NO. 124334)  
TED FATES (BAR NO. 227809)  
2 TIM C. HSU (BAR NO. 279208)  
ALLEN MATKINS LECK GAMBLE  
3 MALLORY & NATSIS LLP  
515 South Figueroa Street, Ninth Floor  
4 Los Angeles, California 90071-3309  
Phone: (213) 622-5555  
5 Fax: (213) 620-8816  
E-Mail: dzaro@allenmatkins.com  
6 tfates@allenmatkins.com  
thsu@allenmatkins.com

7 Attorneys for Plaintiff  
8 WILLIAM J. HOFFMAN, Receiver

9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA**  
11 **WESTERN DIVISION**

12 WILLIAM J. HOFFMAN, Court-  
appointed permanent receiver for  
13 Defendant Nationwide Automated  
Systems, Inc., Relief Defendants Oasis  
14 Studio Rentals, LLC, Oasis Studio  
Rentals #2, LLC, Oasis Studio  
15 Rentals #3, LLC, and their subsidiaries  
and affiliates,

16 Plaintiff,

17 v.

18 GERALD EHRENS, WILMA EHRENS,  
19 RIVIERA INVESTMENTS, L.P., a  
Nevada limited partnership, FIRST  
20 ABBY CORPORATION, a Nevada  
corporation, AMGEST LTD. a Delaware  
21 corporation,

22 Defendants.

Case No. CV15-05747 SJO (FFMx)

DECLARATION OF TIM C. HSU IN  
SUPPORT OF REQUEST FOR ENTRY  
OF DEFAULT OF DEFENDANTS  
RIVIERA INVESTMENTS, L.P. AND  
FIRST ABBY CORPORATION

Ctrm: 1 - 2nd Floor  
Judge: Hon. S. James Otero

1 I, Tim C. Hsu, declare as follows:

2 1. I am an attorney at the law firm of Allen Matkins Leck Gamble  
3 Mallory & Natsis LLP, counsel of record for William J. Hoffman of Trigild, Inc.  
4 ("Receiver"), the Court-appointed permanent receiver for Nationwide Automated  
5 Systems, Inc. ("NASI"), Oasis Studio Rentals, LLC, Oasis Studio Rentals #2, LLC,  
6 Oasis Studio Rentals #3, LLC, and their subsidiaries and affiliates ("Receivership  
7 Entities"), in that Securities and Exchange Commission enforcement action styled as  
8 *Securities and Exchange Commission v. National Automated Systems, Inc., et al.*,  
9 United States District Court, Central District of California, Case No. 14-CV-07249-  
10 SJO (FFMx).

11 2. This Declaration is made in support of the Receiver's Request for Entry  
12 of Default of Defendants Riviera Investments, L.P. and First Abby Corporation  
13 (together, "Defaulting Defendants"). I have personal knowledge of the facts set  
14 forth herein and, if called as a witness, could and would testify to such facts under  
15 oath.

16 3. This action was commenced with the filing of the Complaint on  
17 July 29, 2015. After unsuccessfully attempting to personally serve Defaulting  
18 Defendants with copies of the Summons and Complaint, the Receiver filed a motion  
19 on September 29, 2015 to seek authorization from the Court for service by  
20 publication. The Receiver's motion was granted on October 27, 2015, and the Court  
21 ordered that publication of the Summons be made in the Nevada Legal News, once a  
22 week for four successive weeks, and further ordered that service to Defaulting  
23 Defendants would be deemed complete at the conclusion of the publication.

24 4. Pursuant to the Court's order, the Summons was published in Nevada  
25 Legal News. A true and correct copy of the proof of publication, filed in this action  
26 on December 1, 2015 is attached hereto as **Exhibit A**.

27 5. Notwithstanding the service by publication, and as of the date of this  
28 filing, Defaulting Defendants have not filed any responsive pleading or motion, or

1 otherwise made any appearance in this action. Defaulting Defendants are legal  
2 entities and are thus not infants or incompetent persons.

3 I declare under penalty of perjury under the laws of the State of California  
4 that the foregoing is true and correct.

5 Executed this 23rd day of December 2015, at Los Angeles, California.

6 /s/ Tim C. Hsu

7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
TIM C. HSU

EXHIBIT A

1 DAVID R. ZARO (BAR NO. 124334)  
TED FATES (BAR NO. 227809)  
2 TIM C. HSU (BAR NO. 279208)  
ALLEN MATKINS LECK GAMBLE  
3 MALLORY & NATSIS LLP  
515 South Figueroa Street, Ninth Floor  
4 Los Angeles, California 90071-3309  
Phone: (213) 622-5555  
5 Fax: (213) 620-8816  
E-Mail: dzaro@allenmatkins.com  
6 tfates@allenmatkins.com  
thsu@allenmatkins.com

7 Attorneys for Plaintiff  
8 WILLIAM J. HOFFMAN, Receiver

9 UNITED STATES DISTRICT COURT  
10 CENTRAL DISTRICT OF CALIFORNIA  
11 WESTERN DIVISION

12 WILLIAM J. HOFFMAN, Court-  
appointed permanent receiver for  
13 Defendant Nationwide Automated  
Systems, Inc., Relief Defendants Oasis  
14 Studio Rentals, LLC, Oasis Studio  
Rentals #2, LLC, Oasis Studio  
15 Rentals #3, LLC, and their subsidiaries  
and affiliates,

16 Plaintiff,

17 v.

18 GERALD EHRENS, WILMA EHRENS,  
19 RIVIERA INVESTMENTS, L.P., a  
Nevada limited partnership, FIRST  
20 ABBY CORPORATION, a Nevada  
corporation, AMGEST LTD. a Delaware  
21 corporation,

22 Defendants.

Case No. CV15-05747 SJO (FFMx)

PROOF OF SERVICE BY  
PUBLICATION ON DEFENDANTS  
RIVIERA INVESTMENTS, L.P.; AND  
FIRST ABBY CORPORATION

Ctrm: 1 - 2nd Floor  
Judge: Hon. S. James Otero

AFFP

2:15-CV-5747 AB

## Affidavit of Publication

STATE OF NEVADA }  
COUNTY OF CLARK }

SS


I, Rosalie Qualls state:

That I am Assistant Operations Manager of the Nevada Legal News, a daily newspaper of general circulation, printed and published in Las Vegas, Clark County, Nevada; that the publication, a copy of which is attached hereto, was published in the said newspaper on the following dates:

Oct 29, 2015  
Nov 05, 2015  
Nov 12, 2015  
Nov 19, 2015  
Nov 25, 2015

That said newspaper was regularly issued and circulated on those dates. I declare under penalty of perjury that the foregoing is true and correct.

DATED: Nov 25, 2015

  
\_\_\_\_\_  
Rosalie Qualls

UNITED STATES DISTRICT COURT  
for the

CENTRAL DISTRICT OF CALIFORNIA

Civil Action No. 2:15-cv-5747 AB (PLAx)

WILLIAM J. HOFFMAN, Court-appointed permanent receiver for Defendant Nationwide Automated Systems, Inc., Relief Defendants Oasis Studio Rentals, LLC, Oasis Studio Rentals #2, LLC, Oasis Studio Rentals #3, LLC, and their subsidiaries and affiliates Plaintiff(s)

v. GERALD EHRENS, WILMA EHRENS, RIVIERA INVESTMENTS, L.P., a Nevada limited partnership, FIRST ABBY CORPORATION, a Nevada corporation, AMGEST LTD., a Delaware corporation, Defendant(s)

SUMMONS IN A CIVIL ACTION

To: GERALD EHRENS - 10924 Pine Meadows Court, Las Vegas, NV 89134 WILMA EHRENS - 10924 Pine Meadows Court, Las Vegas, NV 89134 RIVIERA INVESTMENTS, L.P., a Nevada limited partnership - 10924 Pine Meadows Court, Las Vegas, NV 89134 FIRST ABBY CORPORATION, a Nevada corporation, c/o Michael V. Infuso, Esq., GreenInfuso, 3030 S. Jones Blvd., Ste 101, Las Vegas, NV 89146 AMGEST LTD., a Delaware corporation - 10924 Pine Meadows Court, Las Vegas, NV 89134 A lawsuit has been filed against you. Object of Action: This is a Complaint for Fraudulent Transfer, Unjust Enrichment and Constructive Trust. Within 21 days after service of this summons on you (not counting the day you received it) - or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) - you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are: David R. Zaro, Esq., Ted Fates, Esq., Tim C. Hsu, Esq., Allen Matkins Leck Gamble Mallory & Natis LLP, 515 South Figueroa Street, Ninth Floor, Los Angeles, California 90071, Phone: (213) 622-5555; Facsimile: (213) 620-8816 If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court. CLERK OF COURT, s/ Jenny Lam, Signature of Clerk or Deputy Clerk, Date: August 10, 2015 Published in Nevada Legal News  
October 29, November 5, 12, 19, 25, 2015

04103967 00403313 (714)558-2401

NATIONWIDE LEGAL OF NEVADA, LLC  
2112 BUSINESS CENTER DRIVE  
IRVINE, CA 92612

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# PROOF OF SERVICE

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 515 South Figueroa Street, Ninth Floor, Los Angeles, California 90071.

A true and correct copy of the foregoing document(s) described as:

- PROOF OF SERVICE BY PUBLICATION ON DEFENDANTS RIVIERA INVESTMENTS, L.P.; AND FIRST ABBY CORPORATION

will be served in the manner indicated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – the above-described document will be served by the Court via NEF. On December 1, 2015, I reviewed the CM/ECF Mailing Info For A Case for this case and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- Edward G Fates - [tfates@allenmatkins.com](mailto:tfates@allenmatkins.com), [bcfilings@allenmatkins.com](mailto:bcfilings@allenmatkins.com), [jholman@allenmatkins.com](mailto:jholman@allenmatkins.com)
- Tim C Hsu - [thsu@allenmatkins.com](mailto:thsu@allenmatkins.com), [mlyons@allenmatkins.com](mailto:mlyons@allenmatkins.com)
- David R Zaro - [dzaro@allenmatkins.com](mailto:dzaro@allenmatkins.com)

2. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):** On December 1, 2015, I served the following person(s) and/or entity(ies) in this case by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service with delivery fees paid or provided for addressed as follows. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it is deposited with the U.S. postal service on that same day in the ordinary course of business.

Via Mail

Gerald Ehrens  
10924 Pine Meadows Court  
Las Vegas, Nevada 89134

Defendant and Agent for Defendants  
Riviera Investments, L.P., First Abby  
Corporation

Via Mail

Wilma Ehrens  
10924 Pine Meadows Court  
Las Vegas, Nevada 89134

Defendant

1 3. **SERVED BY PERSONAL DELIVERY OR FACSIMILE (indicate method for**  
2 **each person or entity served)**: On \_\_\_\_\_, I served the following person(s) and/or  
3 entity(ies) on the attached Service List at the last known address(es) in this case by  
4 personal delivery, or by facsimile transmission. Via Personal Delivery: I caused  
5 such envelope to be delivered by hand to the offices of the addressee by delivering  
6 same to an employee of World Wide Attorney Service located at 1533 Wilshire  
7 Boulevard, Los Angeles, California 90017. Via Fax by transmitting a true copy of  
8 said document from facsimile machine whose telephone number is (213) 620-8816.  
9 There was no error was reported by the machine. I caused the machine to print a  
10 record of the transmission. Said fax transmission was directed to the facsimile  
11 numbers as stated on the attached mailing list.

12 Executed on December 1, 2015. I declare under penalty of perjury under the laws of the  
13 United States of America that the foregoing is true and correct.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  

/s/ Marcella Lyons

Marcella Lyons